

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Navient Corporation, *et al.*,

Defendants.

Case No. 3:17-CV-00101-RDM
(Hon. Robert D. Mariani)

ELECTRONICALLY FILED

**PLAINTIFF’S MOTION FOR ENTRY OF AN ORDER
ESTABLISHING ADDITIONAL PROTECTIVE ORDER PROCEDURES**

Plaintiff Consumer Financial Protection Bureau respectfully moves for the entry of an Order that supplements the parties’ stipulated protective order (Doc. 66-1) with additional procedures to ensure that any filings that constitute judicial records filed in this case on or after May 19, 2020 (the date of the parties’ summary judgment motions and accompanying materials), are accessible to the public absent specific findings articulating compelling reasons to overcome the presumption in favor of public access applicable to judicial records. The reasons justifying the additional procedures requested by the Bureau are set forth in the brief filed in support of this motion.

A proposed order is being filed with this motion.

Dated: October 9, 2020

Respectfully submitted,

Thomas G. Ward
Enforcement Director

David Rubenstein
Deputy Enforcement Director

Thomas Kim
Assistant Deputy Enforcement Director

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Attorneys for Plaintiff

CERTIFICATE OF NON-CONCURRENCE

I hereby certify pursuant to Local Rule 7.1 that on September 24, 2020, the Bureau requested concurrence from Defendants' counsel in relation to the foregoing motion. Defendants' counsel has informed me that Defendants oppose this motion.

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that on October 9, 2020, I filed the foregoing document with the Court's ECF system, which will send notification of such filing to counsel for Defendants.

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